REMARKS

Claims 1 through 20 are pending in the application.

Claim Rejections – 35 USC § 103

The Examiner indicated that claims 1-11, 13-16 and 18-20 are rejected under 35 U.S.C. § 103 as being unpatentable over Douma et. al. (Douma), U.S. Patent 5,990,884. The Applicant respectfully disagrees.

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Ryoka*, 180 U.S.P.Q. 580 (C.C.P.A. 1974). *See also In re Wilson*, 165 U.S.P.Q. 494 (C.C.P.A. 1970). The Examiner states that Douma shows a device database including a listing of available user interface components at col. 4, lines 59-65.

> In step 210, Intelligent A/V receiver 10 identifies, based on the media I.D., the multimedia component for replaying the user-selected recording medium. A look-up table, for example, may be user for such a purpose: a table stored in RAM, for example, containing media I.D. corresponding to the multimedia component (VTR 16, CD player 18, DAT player 20) in A/V system 14. *Col. 4, Lines 59-65.*

This section discloses identifying a multimedia component for replaying a user-selected recording medium. Thus, Douma discloses utilizing an appropriate device to play a song as selected from a listing of songs, and not a listing of available user interface components for implementing control functions of a device coupled to an information handling system.

Further, the Examiner states that resource data including the user interface components is described at Douma, Col. 6, Lines 57-61, which states "the interface data required for connecting the multimedia component of A/V system 14 to Intelligent A/V receiver 10 is located in a data storage (RAM, ROM, or other memory device) of that component." It is respectfully submitted that the Examiner has misinterpreted user interface component with a multimedia component. User interface components of the present invention include modular interfaces, which may be structured in the form of an object, to provide an interface function. *See Patent Application, Pages 7-8.* Nowhere in the Douma reference is such a user interface component described.

Moreover, the Examiner states that "a user interface generator for determining whether the device is included in said device data and for retrieving the user interface components for that device from said resource database without requiring user interaction, and a layout manager for assembling the user interface components retrieved by said user interface generator into a user interface executable by the information handling system to control the device" is disclosed at Col. 7, Lines 13-40, and Col. 6, Lines 45-61. The Applicant respectfully disagrees.

Col. 7, Lines 13-38

> In operation, as illustrated in FIG. 6, using the GUI program at PC/Web TV 26, the user selects a multimedia component in his or her A/V system 14 and requests control of that component in step 600. In step 602, the selected multimedia component transfers an appropriate application program to Intelligent A/V receiver 10. The application program includes interface specification (modules 136, 138, 140 and 142 of FIG. 5) for that particular component. Once the application program is transferred to Intelligent A/V receiver 10, the graphics image of the component and its control switches are displayed in step 604 for user manipulation and control. That is, all of the necessary graphics and control files in a single application are transferred from the multimedia component for providing a seamless interface between that component and Intelligent A/V receiver 10 without the need for controller update, and for allowing the user to control A/V system 14 using PC/Web TV 26. In yet another aspect of the present invention, various sound field, based on the music type and the room in which A/V system 14 is located, are generated and transferred to Intelligent A/V receiver 10 for use in the appropriate interface application program. The sound field create the listening effect, as if one is, for example, in a jazz club listening to jazz, by using the room configuration and objects in the room. *Col. 7, Lines 12-38.*

Col. 6, Line 45-61

> The prior art one-way communication may present a problem in the systems where additional components are to be added. In these conventional system, the controlling device must be reprogrammed (updated) with the new interface information to add this new component to the system. To overcome the above disadvantage, FIG. 5 shows VTR 15 and CD player 18 containing programmable processor 52, 52' and various software modules comprising the interface specification for those components. The program instruction in those software modules are executed by programmable processors 52, 52'. Namely, in accordance with another aspect of the present invention, the interface data required for connecting the multimedia component of A/V system 14 to Intelligent

> A/V receiver 10 is located in a data storage (RAM, ROM, or other memory device) of that component. *Col. 6, Lines 45-61.*

Nowhere in the above listed sections, or elsewhere in the Douma reference, contain a teaching or suggestion of a user interface generator that retrieves user interface components to have them assembled by a layout manager into a user interface. The Douma reference merely passes a user interface from a multimedia component to an A/V system to enable the A/V system to connect to the component. In the present invention, a user interface is assembled from user interface components, available in a database separate from the device, automatically without user intervention.

Additionally, no teaching or suggestion is found to employ a centralized device database of the present invention. Specifically, a resource database including the user interface components where the resource database is stored separately from the device as claimed in claims 1, 6, 11, and 16 as amended previously is not taught or suggested by the Douma reference. The rejection contains only the Examiner's statement stating the following:

> Although Douma discloses the resource database to be separate databases stored individually in each device rather than a single database containing resources of all device, however, it would have been obvious to an artisan at the time of the invention to use any one of the two options depending on the implementation method.

As the Examiner is well aware, Applicant is required to seasonably challenge statements by the Examiner that are not supported on the record, and failure to do so will be construed as an admission by application that the statement is true. *M.P.E.P. § 2144.03.* Therefore, in accordance with Applicant's duty to seasonably challenge such unsupported statements, the Examiner is hereby required to cite a reference supporting his position that it would have been obvious to utilize a central database in a system of the present invention. If the Examiner is unable to provide such a reference, and is relying on facts within his own personal knowledge, Applicant hereby requests that such facts be set forth in an affidavit from the Examiner under 37 C.F.R. *§ 104(d)(2).* Absent substantiation by the Examiner, it is respectfully request that the rejection under 25 US.C. § 103 be withdrawn.

Further, the Examiner, in addressing the previous response, states that using a centralized resource database for holding device interface data is well known in the art and references Douma, Col. 1, Lines 22-26. However, the paragraph as a whole not only fails to teach the present invention, the reference teaches away from the present invention, as shown in the following excerpt from Douma, Col. 1, Lines 22-33.

> Further, when multimedia components, such as the CD changer, the Video Tape Recorder (VTR), etc. are connected into a single integrated system, interface specifications for each component are typically kept at some central controlling device. If a new component is added to the system, the controlling device must be updated with the interface specification for this new component. This inconvenient procedure is also prone to error resulting in the inoperative component due to the high likelihood of entering incorrect information in the controlling device. This will present the newly added multimedia component from functioning in the system.

Thus, this reference teaches a system that when confronted with a new component requires the loading of a new interface which is "inconvenient", "prone to error" and which may result in a "high likelihood of entering incorrect information in the controlling device". When viewed in conjunction with the Douma specification, it is apparent that Douma addressed these problems by providing a user interface in each device, the interface being transferred to the system to enable communication with the device. Therefore, Douma provides a system of devices wherein each device includes its own interface that may be transferred. However, the present invention includes device data and resource data stored separately from a device, a generator that retrieves user interface components and a layout manager that assembles the user interface components into a user interface. Thus, Douma does not teach or suggest a device database and a resource database utilized to generate a user interface as claimed in claims 1 and 6, nor a database of interface components utilized to generate a user interface as claimed in claims 11 and 16.

As stated in *In re Fritch*, " [t]he mere fact that the prior art may be modified in the manner suggested by the Examiner does not make the modification obvious unless the prior art suggested the desirability of the modification." 23 U.S.P.Q. 2d 1780, 1783-84 (Fed. Cir. 1992). In the present example, since Douma teaches away from a centralized

database, the Douma reference may not then be used to make obvious the modification it explicitly disparages.

Regarding claims 3 and 4, and the amendments to the claims, contrary to the examiner's assertion that "by disclosing an automatic 'two-way' communication method between multimedia devices and the controlling system, Douma indicates/suggests that the device and resource databases are created without requiring user intervention," Douma does not. In fact, Douma discloses no such "automatic" system, nor does Douma disclose a device database created without user intervention as claimed, nor does Douma disclose a resource database created without user intervention as claimed. The cited passage of Douma (col. 6, lines 45-61) merely describes the inclusion of a processor and interface data in each individual multimedia device. Nowhere does the cited passage discuss or mention the concepts of "automatic" or "without user intervention" as asserted by the examiner. In fact, Douma actually teaches away from such concepts in FIG. 6 and in col. 7, lines 13-30 where user intervention is specifically required. It is therefore believed that the rejection to claims 1, 6, 11, and 16, and to their respective dependent claims (M.P.E.P. § 2143.03), is overcome.

The examiner rejected claims 12 and 17 over Douma in view of Naughton et al. (Naughton, US Patent No. 6,020,881).

As discussed with respect to claims 1-11, 13-16, and 18-20, the independent claims from which claims 12 and 17 are unobvious. As a result of the dependency, claims 12 and 17 are likewise unobvious (M.P.E.P. § 2143.03). It is therefore believed that the rejection is overcome.

Therefore, it is respectfully requested that the rejection under 35 U.S.C. §103 be withdrawn.

CONCLUSION

In light of the forgoing, reconsideration and allowance of the claims is earnestly solicited.

Respectfully submitted,
Brandon Grooters,
Gateway, Inc.,

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By: _____
William J. Breen, III
Reg. No. 45,313

William J. Breen, III
SUITER & ASSOCIATES PC
11516 Nicholas St., Suite 205
Omaha, NE 68154
(402) 496-0300 telephone
(402) 496-0333 facsimile